



STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

Department of Environmental Management
DIVISION OF SITE REMEDIATION
291 Promenade Street
Providence, R.I. 02908-5767

December 20, 1994

Debra Carlson, Remedial Project Manager
U.S. Department of the Navy, Northern Division
Naval Facilities Engineering Command
10 Industrial Highway
Code 1823-Mail Stop 82
Lester, PA 19113-2090

RE: *Draft* Preliminary Operation and Maintenance Plan, Interim Remedial Action, Naval Education and Training Center, Newport, Rhode Island.

Dear Ms. Carlson:

The Division of Site Remediation has reviewed the above referenced document. In general, the plan does not go into sufficient detail to serve as a guide for the operation and maintenance of the treatment facility. However, the Division is aware that the Navy may submit a revised version of this document. Therefore, the attached comments are preliminary in nature and are submitted with the understanding that a revised plan will be forth coming.

If you have any questions concerning the comments, please contact me at (401) 277-3872, ext. 7111.

Sincerely,

Paul Kulpa, Project Manager
Division of Site Remediation

cc: Warren S. Angell, DEM DSR
Richard Gottlieb, DEM DSR
Andrew Miniuks, USEPA Region I
Brad Wheeler, NETC

1/13/95 cc: PROTECT FILE

**COMMENTS FOR :
PRELIMINARY OPERATION AND MAINTENANCE PLAN
FOR:
INTERIM REMEDIAL ACTION
NAVAL EDUCATION AND TRAINING CENTER
NEWPORT, RHODE ISLAND
NOVEMBER 16, 1994**

1. General Comment.

For the purposes of commenting, page numbering would be helpful. Please number all pages.

2. Executive Summary.

It is stated that this O & M manual is for the first 30 days of operation of the plant and that another O & M manual will be submitted to the government within the first 150 days of start-up. Please explain what procedures will be used to operate and maintain the plant between 30 and 150 days.

**3. Executive Summary:
Description of Normal Operation and Maintenance.**

The procedures outlined in this section of the report do not appear to cover the full spectrum of activities normally associated with the operation and maintenance of the treatment facility. The report should address each component of the system from the extraction wells to the GAC unit, and discuss in detail all of the O&M requirements for these systems.

**4. Executive Summary (?), Item C, Description of Routine Monitoring and Laboratory Testing;
Treatment System Monitoring, Item 1.a (Notes).**

Please explain why measurements of TSS, pH, TAL metals, and VOC's are also not being taken of the plant effluent. It would seem this would be the most important measurement since it would give one an indication of how well the overall treatment process is working.

**5. Executive Summary (?), Item C, Description of Routine Monitoring and Laboratory Testing;
Treatment System Sampling.**

"Samples will be analyzed for VOCs via method 8240/8270, and inorganics via EPA CLP TAL."

The Division will not require CLP analysis of the water samples.

**6. QA/QC Plan, Methodology;
Paragraph 1, Sentence 1.**

It is stated that the "Field Sampling and Laboratory Testing Plan" was submitted on 11/10/93 and approved on 12/01/93. Please state to whom the plan was submitted and who approved the plan. RIDEM has no record of receiving this plan.

**7. QA/QC Plan, Groundwater Sampling;
Paragraph 1.**

Total suspended solids and turbidity should also be included in this section as groundwater parameters to measure.

**8. Section D., Description of Alternative Operation and Maintenance;
Item 2.**

Item 2 (Analysis of Vulnerability and Additional Resources) directs the reader to SEE ATTACHED LETTER. Please provide the attached letter.

9. Site Safety Health Plan.

Since this is an O & M manual for the operation of a treatment facility please explain why the site safety health plan provided is for a construction scenario. Please provide a site safety health plan for the operation of a treatment facility noting dangers that may be present such as the handling of treatment chemicals.

**10. Appendix B, Field Sampling Plan:
Groundwater Samples, Paragraph 1.**

"Samples will be analyzed for the entire TAL (except the pesticides/PCB fraction) according to EPA CLP TAL."

The Division will not require CLP analysis of the groundwater samples. However, the Division request that all samples be anayzed for TPH using EPA 418.1 as well as, the stipulated parameters.